

EXHIBIT D

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24 **UNITED STATES DISTRICT COURT**

25 **NORTHERN DISTRICT OF CALIFORNIA**

26 IN RE TEZOS SECURITIES LITIGATION

27 Master File No. 17-cv-06779-RS

28 **CLASS ACTION**

29 **DECLARATION OF ARTIOM FRUNZE
30 IN SUPPORT OF PLAINTIFFS' MOTION
31 FOR CLASS CERTIFICATION**

32 Date: April 24, 2019
33 Time: 1:30 p.m.
34 Crtrm: 3

35 Judge: Hon. Richard Seeborg

1 I, ARTIOM FRUNZE, declare as follows pursuant to 28 U.S.C. § 1746:

2 1. I respectfully submit this Declaration in support of Plaintiffs' motion for class
 3 certification, appointment as class representatives and appointment of LTL Attorneys and Hung G.
 4 Ta, Esq. PLLC as class counsel in the above-captioned action.

5 2. I have reviewed the Consolidated Class Action Complaint filed in this lawsuit on April
 6 3, 2018 (Dkt. No. 108), as amended pursuant to stipulation and order, entered November 21, 2018
 7 (Dkt. No. 183).

8 3. I am seeking appointment by this Court as Class Representative for the following
 9 Class:

10 All persons and entities who, directly or indirectly, contributed Bitcoin or
 11 Ethereum to the Tezos Initial Coin Offering conducted in July 2017.
 12 Excluded from the Class are Defendants, and any person, firm, trust,
 corporation, or other entity related to or affiliated with any Defendant.

13 4. I invested in the Tezos Initial Coin Offering (the "Tezos ICO"), which was held in
 14 July 2017. The dates and amounts of my investments, as well as the number of Tezos tokens (XTZ)
 15 that I was promised, were as follows:

16 Investment	17 Trade Date	18 Amount of XTZ Promised
20 ETH	July 2, 2017	13,953.72
98 ETH	July 2, 2017	68,716.62
120 ETH	July 3, 2017	82,937.04

21 5. I did not purchase the Tezos tokens at the direction of counsel or in order to participate
 22 in this lawsuit.

23 6. I understand that this lawsuit alleges that the Tezos ICO was an unregistered sale of
 24 securities, in violation of the U.S. Securities Act of 1933.

25 7. I am willing to serve as a Class Representative on behalf of the Class, including
 26 providing testimony at deposition and trial, if necessary. I understand and accept the responsibilities
 27

1 and obligations of serving as a Class Representative, and am willing to oversee the vigorous
2 prosecution of this litigation.

3 8. I will not, either directly or indirectly, accept any payment for serving as a
4 representative party on behalf of the Class beyond my *pro rata* share of any recovery, except such
5 reasonable costs and expenses (including lost wages) directly relating to the representation of the
6 Class, as approved or ordered by the Court.

7 9. I have communicated with Ronald Puma, the managing member and authorized
8 representative of the other proposed Class Representative, Pumaro LLC. We communicated via a
9 conference call with counsel to discuss our duties as Class Representatives and the joint prosecution
10 of the litigation.

11 10. Mr. Puma and I intend to oversee this litigation and our counsel to ensure the efficient
12 and zealous prosecution of Class claims. To this end, we have exchanged contact information to
13 enable us to confer, with or without counsel, on short notice to ensure timely decision-making.

14 I declare under penalty of perjury under the laws of the United States of America that the
15 foregoing statements relating to me are true and correct to the best of my knowledge.

16 Executed this **9th** day of January, 2018 at Richlands, Australia.

ARTIOM FRUNZE